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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

July 7, 2003

Mrs. Dawn M Hays, PE  
Atlantic Division Naval Facilities Engineering Command  
Code EV22DH  
1510 Gilbert Street  
Norfolk, VA 235 11-2699

Re: EPA review of St. Julien's Creek Draft Site Specific WP and SAP - Basewide  
Groundwater Background Investigation Report

Dear Mrs Hays,

Thank you for the opportunity to review and comment on Draft Site Specific Work Plan, and Sampling and Analysis Plan - Basewide Groundwater Background Investigation Report. Please consider the following comments in the revision of the subject document prior to mobilizing for field work..

Discussion under **Groundwater Sampling, p. 4-3** indicates that the low flow method will be used for purging and sampling, yet the information noted in **Groundwater Monitoring Well Installation, p. 4-2** describes the use of bailers or pumps. The low flow method is preferred. The narratives should be changed to indicate which methods will be used.

Well development should proceed until the water is not turbid, not just until 6 hours have passed.

It is unclear why the Yorktown wells will not be sampled and used for the background investigation. The location of water supplies with respect to the site, the location of groundwater bearing units the water supplier uses (if uses groundwater), how groundwater is used on site, and whether there are any domestic wells nearby are important for the background study. This information is necessary to fully evaluate groundwater risk.

Please feel free to contact me if you have any question or concerns regarding these comments.

Sincerely,

Todd Richardson  
Remedial Project Manager  
EPA, Region III  
1650 Arch Street, Code 3HS13  
Philadelphia, PA 19103  
Superfund, Federal Facilities Section  
[richardson.todd@epa.gov](mailto:richardson.todd@epa.gov)  
(215)814-5264